



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

May 9, 2017

Ray Heidecker
Fusion Inc., Plant Two
4658 E 355th Street
Willoughby, OH 44094

**Re: Fusion Inc., Plant Two
Notice of Violation (NOV)
Air Permit
Lake County
DAPC Facility ID 0243161230**

CERTIFIED MAIL

91 7199 9991 7037 0955 9205

Division of Air Pollution Control

Subject: Notice of Violation/Partial Resolution of Violation

Dear Mr. Heidecker:

On February 10, 2017, this office received a Permit Evaluation Report (PER) for Fusion Inc., Plant Two (Fusion). From March 2 to May 3, Ohio EPA requested additional information which was received from Ms. Brooke Thompson at HZW Environmental Consultants from March 14 to May 3. Thank you for the thorough responses to my questions and submittal of pressure drop readings for the air pollution control equipment at Fusion from January 1, 2015 to February 26, 2017.

Listed below are "Findings and Violations" based upon the PER and additional information received. The findings and violations are followed by "Requested Actions" necessary to address the stated findings and violations as well as the "Partial Resolution of Violations" based upon pressure drop records received on March 14, 2016.

Findings and Violations

Fusion failed to comply with the following terms and conditions of the Permit-to-Install and Operate (PITO), P0107669:

1. C.1.d)(1) – C.1.d)(2) for P002, Soldering and brazing paste mix operations, controlled by an 11,000 dscfm baghouse:

C.1.d)(1) "In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2 to 8 inches of water."

C.1.d)(2) *"...Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:*

- a. the date and time the deviation began;*
- b. the magnitude of the deviation at that time;*
- c. the date the investigation was conducted;*
- d. the name(s) of the personnel who conducted the investigation;*
and
- e. the findings and recommendations.*

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit...The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;*
- b. the date corrective action was completed;*
- c. the date and time the deviation ended;*
- d. the total period of time (in minutes) during which there was a deviation;*
- e. the pressure drop readings immediately after the corrective action was implemented; and*
- f. the name(s) of the personnel who performed the work."*

From 4/11/2016 to 11/21/2016, pressure drop readings for P002's dust collector were recorded below 2" of water, with the lowest pressure drop reading recorded at 1". During this time proper investigation into the low readings was not performed and corrective actions were not implemented to bring the operation of the control equipment within the acceptable range.

2. C.3.d)(1) & C.3.d)(3) for P004, Solder & brazing powder atomizing operation, controlled by four baghouses with rated exhaust flows (dscfm) of 1,800 (2A), 8,400 (4A), and 11,000 (5A & 6A):

C.3.d)(1) "In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across baghouses 4A, 5A, and 6A is between 2 to 8 inches of water."

C.3.d)(3) This section states the same requirements as C.1.d)(2) above for P002.

On 10/1/2015, dust collector **2A** was relocated from P004 to P003. As of the date of this notice, a permit modification request has not been submitted to Ohio EPA to account for this change.

From 7/5/2016 to 11/23/2016, pressure drop readings for dust collector **4A** were recorded below 2" of water, with the lowest pressure drop reading recorded at 1". During this time, proper investigation into the low readings was not performed and corrective actions were not implemented to bring the operation of the control equipment within the acceptable range.

Finally, from 1/19/2016 to 11/18/2016, pressure drop readings for dust collector **6A** were recorded below 2" of water, with the lowest pressure drop reading recorded at 0.5". During this time, proper investigation into the low readings was not performed and corrective actions were not implemented to bring the operation of the control equipment within the acceptable range.

Failure to comply with the terms and conditions of an air pollution permit is a violation of Ohio Revised Code (ORC) 3704.05(C).

Requested Actions

Within 14 days of receipt of this letter, Fusion shall submit an administrative modification request to update the baghouse information for P004 and P003, if required.

Partial Resolution of Violations

According to 2016 pressure drop records, the following corrective actions were implemented:

1. On November 18, 2016, for P004, dust collector 6A's clogged manometer was replaced.
2. On November 21, 2016, for P002, dust collector 2B's manometer tubing, that had been chewed by an animal, was repaired.
3. On November 22, 2016, for P004, dust collector 4A's blowdown board was replaced.
4. On November 23, 2016, for P004, dust collector 4A's timer and clogged manometer were replaced.
5. As of November 17, 2016, the maintenance department implemented monthly preventative maintenance inspections for all of the dust collection systems. The first monthly inspection was completed on December 19, 2016.

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From November 23, 2016 to February 24, 2017, no additional pressure drop deviations were recorded. Based on the information provided, it appears that the facility completed the necessary corrective actions to bring the emissions units into compliance, therefore, the referenced violations are considered resolved.

Conclusion

NEDO requests that Fusion promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. **Within 14 days of receipt of this letter**, please provide the documentation requested above. If you have already resolved the violations listed above, thank you.

Failure to comply with ORC 3704 and the rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, Fusion is requested to submit written correspondence describing the steps that will be taken by date certain to attain compliance.

Please note that the submission of any requested information already received or in response to this letter does not constitute a waiver of the Ohio EPA's authority to seek administrative or civil penalties pursuant to ORC Section 3704.06 for the violations noted. The decision on whether to pursue or decline to pursue such penalties regarding these violations is dependent on several factors, one of which is the company's future compliance with Ohio EPA regulatory requirements.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact me by phone at (330) 963-1247 or by email at christine.barnie@epa.ohio.gov.

Sincerely,



Christine M. Barnie
Environmental Specialist 2
Division of Air Pollution Control
Northeast District Office

CMB:bo

ec: John Paulian/James Kavalec, DAPC/CO
Corey Kurjian, DAPC/NEDO
Tim Fischer, DAPC/NEDO
Brian Dickens, U.S. EPA Region V
Ray Heidecker, Fusion Inc., Plant Two